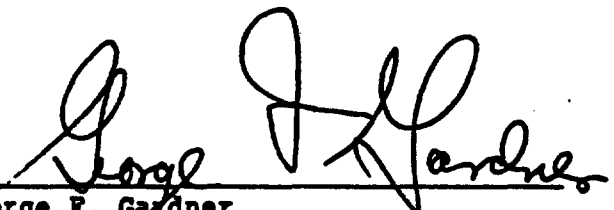
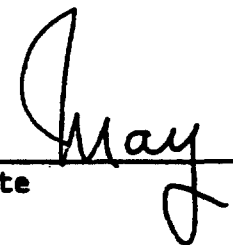


I respectfully reaffirm that the circumstances warrant the conclusion that Raystay is qualified to be the licensee of the five LPTV stations at issue.


George F. Gardner

 May 4, 1990
Date

R-6-27
COPY

LAW OFFICES
COHEN AND BERFIELD, P.C.

BOARD OF TRADE BUILDING
1129 20TH STREET, N.W.
WASHINGTON, D.C. 20036
(202) 466-8565

LEWIS I. COHEN
MORTON L. BERFIELD
ROY W. BOYCE
JOHN J. SCHAUBLE*

TELECOPIER
(202) 785-0934

*VIRGINIA BAR ONLY

May 7, 1990

RECEIVED

MAY - 7 1990

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

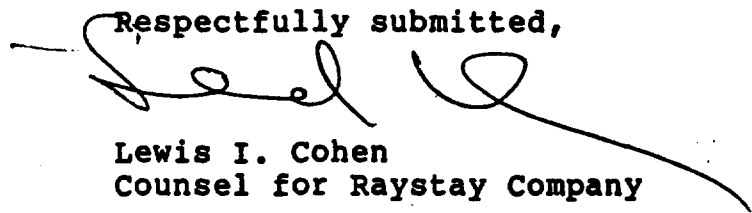
RE: BPTTL-890309PA Lancaster, PA

Dear Ms. Searcy:

On behalf of Raystay Co. there is attached hereto a Declaration of George Gardner. This Declaration is a supplement to Mr. Gardner's Declaration filed on March 14, 1990 in the above captioned proceeding.

It is respectfully submitted that based upon the showing contained in this and the March 14 Declaration, the Commission should grant the above captioned application.

Respectfully submitted,



Lewis I. Cohen
Counsel for Raystay Company

Enclosure

DECLARATION

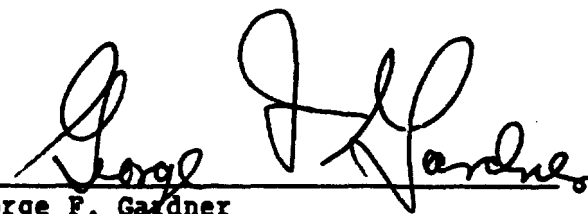
George F. Gardner hereby declares under penalty of perjury that the following is true and correct to the best of his personal knowledge:

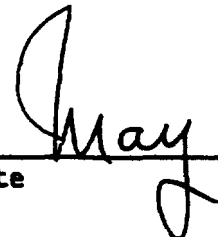
This Declaration is intended by me to supplement my early declaration dated March 11, 1990 which was submitted to the Commission on March 14, 1990.

Since the filing of the Advave application in 1983, no allegations have been made of any significant misconduct of any kind by myself or any company of which I am involved, and I am aware of no such misconduct. Out of an abundance of caution (since I do not believe it reflects significant misconduct), I would note that Raystay Co. was assessed a forfeiture of \$2,000 for repeated instances of signal leakage in excess of that permitted by the Rules on its cable television system in the Carlisle, Pennsylvania area. Raystay Co., 65 RR2d 1191 (1988).

In connection with the operation of low power station W40AF licensed to Raystay Co., I have instructed my FCC counsel, who are also Raystay's FCC counsel, to devise a compliance program which will ensure that Raystay's operation of its low power television station is strictly in compliance with all Commission Rules and Regulations. I have further instructed counsel to report to me at three month intervals regarding continuing compliance with Commission Rules and Regulations. This will permit me to satisfy myself on this important matter. If the Commission grants the five pending LPTV applications, the compliance program will be extended to include these stations.

I respectfully reaffirm that the circumstances warrant the conclusion that Raystay is qualified to be the licensee of the five LPTV stations at issue.


George F. Gardner

 May 4, 1990
Date

R-6-24
COPY

LAW OFFICES
COHEN AND BERFIELD, P.C.

BOARD OF TRADE BUILDING
1129 20TH STREET, N.W.
WASHINGTON, D.C. 20036
(202) 466-8565

LEWIS I. COHEN
MORTON L. BERFIELD
ROY W. BOYCE
JOHN J. SCHAUBLE*
*VIRGINIA BAR ONLY

TELECOPIER
(202) 785-0934

May 7, 1990

RECEIVED

MAY - 7 1990

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

RE: BPTTL-890309NZ Lebanon, PA

Dear Ms. Searcy:

On behalf of Raystay Co. there is attached hereto a Declaration of George Gardner. This Declaration is a supplement to Mr. Gardner's Declaration filed on March 14, 1990 in the above captioned proceeding.

It is respectfully submitted that based upon the showing contained in this and the March 14 Declaration, the Commission should grant the above captioned application.

Respectfully submitted,


Lewis I. Cohen
Counsel for Raystay Company

Enclosure

DECLARATION

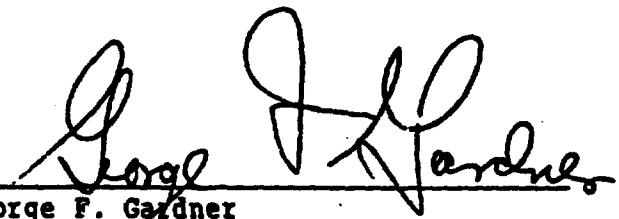
George F. Gardner hereby declares under penalty of perjury that the following is true and correct to the best of his personal knowledge:

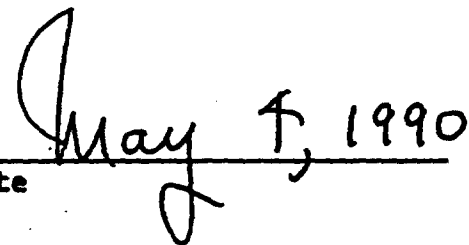
This Declaration is intended by me to supplement my early declaration dated March 11, 1990 which was submitted to the Commission on March 14, 1990.

Since the filing of the Advave application in 1983, no allegations have been made of any significant misconduct of any kind by myself or any company of which I am involved, and I am aware of no such misconduct. Out of an abundance of caution (since I do not believe it reflects significant misconduct), I would note that Raystay Co. was assessed a forfeiture of \$2,000 for repeated instances of signal leakage in excess of that permitted by the Rules on its cable television system in the Carlisle, Pennsylvania area. Raystay Co., 65 RR2d 1191 (1988).

In connection with the operation of low power station W40AF licensed to Raystay Co., I have instructed my FCC counsel, who are also Raystay's FCC counsel, to devise a compliance program which will ensure that Raystay's operation of its low power television station is strictly in compliance with all Commission Rules and Regulations. I have further instructed counsel to report to me at three month intervals regarding continuing compliance with Commission Rules and Regulations. This will permit me to satisfy myself on this important matter. If the Commission grants the five pending LPTV applications, the compliance program will be extended to include these stations.

I respectfully reaffirm that the circumstances warrant the conclusion that Raystay is qualified to be the licensee of the five LPTV stations at issue.


George F. Gardner


Date

CERTIFICATE OF SERVICE

I, Dana Chisholm, do hereby certify that on the 14th day of September 1993, a copy of the foregoing "Opposition To Second Motion To Enlarge Issues Against Glendale Broadcasting Company" was sent first-class mail, postage prepaid to the following:

James Shook, Esq.*
Gary Schonman, Esq.
Hearing Branch
Federal Communications Commission
2025 M Street, NW, Room 7212
Washington, DC 20554

Colby M. May, Esq.
May & Dunne, Chartered
1000 Thomas Jefferson Street, NW
Suite 520
Washington, DC 20007
Counsel for Trinity Broadcasting of Florida, Inc.,
Trinity Broadcasting Network, and National Minority
TV, Inc.

Nathaniel F. Emmons, Esq.
Howard A. Topel, Esq.
Mullin, Rhyne, Emmons & Topel, P.C.
1000 Connecticut Avenue, N.W., #500
Washington, DC 20036
Co-Counsel for Trinity Broadcasting of Florida, Inc.,
Trinity Broadcasting Network, and National Minority
TV, Inc.

David Honig, Esq.
Law Offices of David E. Honig
3636 16th Street, N.W., B-863
Washington, D.C. 20010
Counsel for Spanish American League Against
Discrimination


Dana Chisholm

* Hand Delivered